

1 Goonan's room. It is provisionally filed under seal for the reasons set forth in the Administrative Motion
2 to Seal.

3 6. **Exhibit D** is a 24-page pamphlet on Operation Campus Flood, which Mr. Goonan has
4 admitted to authoring. It is provisionally filed under seal for the reasons set forth in the Administrative
5 Motion to Seal.

6 7. **Exhibit E** consists of pictures taken during the course of search warrant executions on
7 Mr. Goonan's residences on June 17, 2024. This exhibit is provisionally filed under seal for the reasons
8 set forth in the Administrative Motion to Seal.

9 8. **Exhibit F** is a summary chart of some of Mr. Goonan's correspondence while in custody
10 that was prepared by an FBI Special Agent. The chart is limited to those letters that were intercepted by
11 the jail and provided to the FBI through February 2025. It is provisionally filed under seal for the
12 reasons set forth in the Administrative Motion to Seal.

13 9. **Exhibit G** is a true and correct copy of correspondence that Mr. Goonan sent to an
14 individual in Northampton, Massachusetts. It is dated September 21, 2024. It is provisionally filed
15 under seal for the reasons set forth in the Administrative Motion to Seal.

16 10. **Exhibit H** is a true and correct copy of correspondence that Mr. Goonan sent to an
17 individual in Tucson, Arizona. It is dated November 26, 2024. It is provisionally filed under seal for the
18 reasons set forth in the Administrative Motion to Seal.

19 11. **Exhibit I** is a true and correct copy of correspondence that Mr. Goonan sent to an
20 individual in Riverside, California. It is dated August 6, 2024. It is filed provisionally under seal for the
21 reasons set forth in the Administrative Motion to Seal.

22 12. **Exhibit J** is a true and correct copy of correspondence that Mr. Goonan sent to an
23 individual in Riverside, California. It is erroneously dated January 2024 but was likely written in
24 January 2025. It is filed provisionally under seal for the reasons set forth in the Administrative Motion to
25 Seal.

26 13. **Exhibit K** is a true and correct copy of correspondence that Mr. Goonan sent to an
27 individual or organization in Chicago, Illinois. It is dated January 15, 2025. It is filed provisionally
28 under seal for the reasons set forth in the Administrative Motion to Seal.

1 14. **Exhibit L** is a true and correct copy of correspondence from Mr. Goonan to an address in
2 Brooklyn, New York. It is dated November 30, 2024, and is filed provisionally under seal for the
3 reasons set forth in the Administrative Motion to Seal.

4 15. **Exhibit M** is a true and correct copy of correspondence from Mr. Goonan to an
5 individual in Philadelphia, Pennsylvania. It is dated October 2024. I understand that officials at the
6 Santa Rita Jail reviewed this correspondence and declined to forward it to the recipient based on security
7 concerns. This exhibit is provisionally filed under seal for the reasons set forth in the Administrative
8 Motion to Seal.

9 16. **Exhibit N** is a true and correct copy of correspondence from Mr. Goonan to an individual
10 in Pennsylvania. It is dated February 16, 2025, and is filed provisionally under seal for the reasons set
11 forth in the Administrative Motion to Seal.

12 17. **Exhibit O** is a true and correct copy of correspondence from Mr. Goonan to individuals
13 in San Francisco, California. It is dated December 2024. It is filed provisionally under seal for the
14 reasons set forth in the Administrative Motion to Seal.

15 18. **Exhibit P** is a true and correct copy of correspondence from Mr. Goonan to an individual
16 in Riverside. It is dated February 15, 2025. It is filed provisionally under seal for the reasons set forth in
17 the Administrative Motion to Seal.

18 19. **Exhibit Q** is a true and correct copy of correspondence from Mr. Goonan to an individual
19 in Oakland. It is dated February 17, 2025. It is filed provisionally under seal for the reasons set forth in
20 the Administrative Motion to Seal.

21 20. **Exhibit R** is a true and correct copy of correspondence from Mr. Goonan to an individual
22 in San Marcos, Texas. It is dated February 17, 2025. It is filed provisionally under seal for the reasons
23 set forth in the Administrative Motion to Seal.

24 21. **Exhibit S** is a true and correct copy of correspondence from Mr. Goonan to an individual
25 in Eugene, Oregon. It is dated March 14, 2025. It is filed provisionally under seal for the reasons set
26 forth in the Administrative Motion to Seal.

27 22. **Exhibit T** is a true and correct copy of correspondence from Mr. Goonan to an individual
28 in Fair Oaks, California. It is dated November 13, 2024 and is filed provisionally under seal for the

1 reasons set forth in the Administrative Motion to Seal.

2 23. **Exhibit U** is a true and correct copy of correspondence from Mr. Goonan to an individual
3 in Oakland. It is dated November 2024 and is filed provisionally under seal for the reasons set forth in
4 the Administrative Motion to Seal.

5 24. **Exhibit V** is a true and correct copy of correspondence from Mr. Goonan to individuals
6 in Seattle, Washington. It is dated February 28, 2025 and is filed provisionally under seal for the
7 reasons set forth in the Administrative Motion to Seal.

8 25. **Exhibit W** is a true and correct copy of an Application for a Search Warrant. It Is filed
9 provisionally under seal for the reasons set forth in the Administrative Motion to Seal.

10 26. **Exhibit X** is a true and correct copy of correspondence from Mr. Goonan to an individual
11 in Riverside. It is dated July 28, 2024 and is filed provisionally under seal for the reasons set forth in the
12 Administrative Motion to Seal.

13 27. **Exhibit Y** consists of true and correct copies of redacted versions of correspondence that
14 Mr. Goonan has sent to a person who works at a legal services organization. Two of the letters were
15 obtained directly from the legal services organization, and one was obtained via search warrant. The
16 government is only in possession of redacted versions of this correspondence, but counsel for the
17 defendant is in possession of unredacted copies. This exhibit is filed provisionally under seal for the
18 reasons set forth in the Administrative Motion to Seal.

19 28. **Exhibit Z** is a true and correct copy of an FBI FD-302 record of interview with a witness
20 who works at a legal-services organization. It is filed provisionally under seal for the reasons set forth in
21 the Administrative Motion to Seal.

22 29. **Exhibit AA** is a true and correct copy of correspondence that Mr. Goonan sent to an
23 individual in Fair Oaks, California. It is dated December 5, 2024. It is filed provisionally under seal for
24 the reasons set forth in the Administrative Motion to Seal.

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1 I declare under penalty of perjury that the foregoing is true and correct to the best of my
2 knowledge and belief.

3 Dated at San Francisco, California this 16th day of September, 2025.

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5 */s/ Nikhil Bhagat*

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7 NIKHIL BHAGAT
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